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Counsel for Defendant CHARLES MOORE

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

CHARLES MOORE,  
Defendant.

No. CR 14-0021 JST

STIPULATION AND ~~PROPOSED~~  
ORDER CONTINUING CHANGE OF  
PLEA DATE; EXCLUSION OF TIME

**STIPULATION**

IT IS HEREBY STIPULATED, by and between the parties to this action, that the change of plea date for defendant Charles Moore, currently scheduled for December 12, 2014, at 9:30 a.m., may be continued to January 2, 2015, at 9:30 a.m. for change of plea. The reason for the proposed continuance is Mr. Moore has almost completed his stay at New Bridge Foundation and is scheduled to graduate on December 12, 2014. A continuance will allow Mr. Moore to focus on his treatment and complete the program without the distraction of attorney meetings and a court appearance and enable the parties to meet and continue to review the discovery and agreement prior to court.

IT IS FURTHER STIPULATED THAT the time to January 2, 2015, should be excluded in accordance with the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(1)(A) and (h)(7)(B)(iv) for effective

preparation taking into consideration due diligence to enable counsel to meet with Mr. Moore once he has completed New Bridge to review discovery and finalize the plea agreement.

DATED: 12/09/14

/s/  
JOYCE LEAVITT  
Assistant Federal Public Defender

DATED: 12/09/14

/s/  
THOMAS MOORE  
Assistant United States Attorney

I hereby attest that I have permission of the parties to enter a conformed signature (/s/) for all signatures within this e-filed document.

## ORDER

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the change of plea date for defendant Charles Moore, may be continued to January 2, 2015, at 9:30 a.m. for change of plea.

IT IS FURTHER ORDERED THAT the time from December 12, 2014, to January 2, 2015, should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(1)(A) and (h)(7)(B)(iv) for effective preparation of counsel taking into consideration due diligence to enable defense counsel to meet with Mr. Moore once he completes New Bridge, review discovery and finalize the plea agreement. The Court finds there is good cause and the ends of justice served by the granting of the continuance outweigh the interests of the public and defendant in a speedy and public trial. Failure to grant the requested continuance would unreasonably deny counsel reasonable time necessary for effective preparation, taking into account due diligence.

SO ORDERED.

DATED: December 10, 2014

